

Nebraska Public Service Commission

COMMISSIONERS:

ANNE C. BOYLE
ROD JOHNSON
FRANK E. LANDIS
TIM SCHRAM
GERALD L. VAP



300 The Atrium, 1200 N Street, Lincoln, NE 68508

Post Office Box 94927, Lincoln, NE 68509-4927

Website: www.psc.state.ne.us

Phone: (402) 471-3101

Fax: (402) 471-0254

NEBRASKA CONSUMER HOTLINE:

1-800-526-0017

EXECUTIVE DIRECTOR:

MICHAEL G. HYBL

August 8, 2011

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street S.W.
12th Street Lobby, TW-A325
Washington, D.C. 20554

NOTICE OF EX PARTE COMMUNICATION

Re: WC Docket No. 11-42-Lifeline and Link Up Reform and Modernization; CC Docket No. 96-45-Federal-State Joint Board on Universal Service; WC Docket No. 03-109-Lifeline and Link Up.

Dear Ms. Dortch:

On August 4, 2011, Commissioner Anne Boyle, Mike Hybl, Sue Vanicek, Andrea Grell and the undersigned of the Nebraska Public Service Commission participated in a telephone conference call with Jonathan Lechter, Kimberly Scardino and Jamie Susskind of the Wireline Competition Bureau relative to the Commission's Lifeline reform efforts. We discussed the NPSC's coordinated enrollment and certification process with the State Department of Health and Human Services (NDHHS) to enroll and verify Lifeline participants on certain qualifying programs. This process is described in more detail below:

Lifeline Enrollment and Certification: In 2003, the NPSC executed a memorandum of understanding with the Nebraska Department of Health and Human Services (NDHHS) to coordinate enrollment of eligible Lifeline subscribers. In its agreement, NDHHS agreed to add, as a formal element, NPSC-prescribed information regarding the Lifeline program to its staff training and information packet. The NPSC and NDHHS agreed that NDHHS will distribute that information to its supervisors thereafter on a regular basis occurring no less than two times per year. The NDHHS also agreed to send out a one (1) time, computer generated, mass mailing to all persons who potentially qualify for the NTAP making them aware of their eligibility. The NPSC and the NDHHS agreed that on a regular basis thereafter, the NDHHS will mail out application forms to newly eligible persons on a monthly basis. A copy of the NPSC-prescribed letter mailed to subscribers by NDHHS is enclosed.

Once a subscriber obtains the application from the NPSC, NDHHS, or from the carrier, and submits it to the NPSC, the NPSC staff reviews the application for completeness. If the subscriber's eligibility is based on Medicaid, Food Stamps or Kids Connection, then the NPSC staff accesses NDHHS information via a secured file and NPSC staff verifies that the subscriber is on the said program. If the subscriber's eligibility is based on SSI, Federal Housing or LIHEAP, then the subscriber is required to return the application with proof of participation in said program.

Lifeline Recertification Procedures: Based on the date of eligibility, roughly 1000 subscribers are pulled from the Lifeline database each month. The list is then sorted according to the subscribers listed eligible telecommunications carrier. The NPSC staff then makes a request to the carriers to confirm or provide updated subscriber mailing address and phone number. Subscribers are sent a recertification letter and Lifeline application. The NPSC's recertification letter is enclosed for your information. Subscribers have 60 days to be re-approved for Lifeline. The NPSC staff performs the same certification process described above to document program eligibility. Failure to be re-approved results in the subscriber being de-enrolled from Lifeline. The eligible telecommunications carriers then receive a carrier-specific list of ineligible subscribers and are asked to remove credits from the listed subscriber accounts.

During the teleconference we also briefly discussed how a national database could be used to verify enrollment and eliminate duplicates. Our comments in this regard were consistent with prior comments filed by the NPSC on April 21, 2011. We further note, however, that the Lifeline account information kept by the NPSC as well as the information housed by NDHHS is considered highly confidential. Accordingly, we would recommend the development of an interface system which can permit the FCC and states to confirm subscriber eligibility but does not allow confidential subscriber information to be released or used for other purposes.

In addition, we also briefly responded to the statements made by Tracfone in its July 28, 2011 ex parte letter. In response, we provided some examples of carrier outreach efforts, NPSC outreach, and some of the reasons why consumers may be reluctant to enroll in programs which would make them Lifeline eligible. We have not encountered issues where subscribers have found it difficult to provide the NPSC with documentation of eligibility where enrolled in SSI, LIHEAP, or Federal Housing, which are the programs outside of the coordinated enrollment process.

Pursuant to § 1.1206(b) of the Commission's rules, this letter is being filed electronically. Any questions concerning this matter should be directed to the undersigned.

Sincerely,



Shana Knutson
Staff Attorney

Ms. Marlene Dortch
August 8, 2011

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Enclosures

cc: Jonathan Lechter
Kimberly Scardino
Jamie Susskind

DEPARTMENT OF HEALTH AND HUMAN SERVICES
301 Centennial Mall
P.O. Box 95026
Lincoln NE 68509-5026

NEBRASKA TELEPHONE ASSISTANCE PROGRAM
ELIGIBILITY LETTER

SSN 000-00-0000

_____ Medicaid
_____ Food Stamps
_____ Children's Medicaid Programs

Applicant Name
ADDRESS
ADDRESS
CITY, STATE, ZIP

Physical Address:
ADDRESS
ADDRESS
CITY, STATE, ZIP

10-06-2010

Dear: NTAP:

If you live on Tribal land, DO NOT complete this application. Contact your local phone company for a Tribal land Discount.

Since you, or your child(ren) are participating in the program(s) identified above, you are eligible for the Nebraska Telephone Assistance Program or NTAP. The NTAP program, administered by the Nebraska Public Service Commission, lowers the cost of connection or activation fees and monthly phone service costs. If you have had phone service for over 60 days, you are not eligible for the connection or activation fee credit; however, you are eligible for a discount for monthly service. Some phone companies do not participate in this program. If you are unsure of your phone company's participation, please call the number listed below. The discount will appear as a credit on your monthly phone bill within 2-3 months.

NTAP is also able to help on waiving deposits. To waive a deposit you must have your NTAP approval number (your approval number is sent to you by letter after your application is approved) and be willing to put a long distance blocker on your phone (you would not be able to make long distance calls) when you set up your phone account. **SELECT BELOW ALL THAT APPLY**

_____ A) I have phone service. My phone number is: (_____) _____

Name of Phone Company is: _____

Name on Phone Bill: _____

(The phone bill must be in/or contain the applicant's name above)

_____ B) I have moved or started service in the last 60 days. Date service began: _____

_____ C) My phone service is at a different address than the address listed above. (This is your street address, not the address of your phone company)

My phone service is at _____
Street City Zip Code

_____ D) I do not currently have phone service or have been disconnected.

SELECT ONE OF THE STATEMENTS BELOW

☐ I certify that neither I, nor anyone else in my household, is currently receiving NTAP assistance for wireless or traditional phone service.

☐ I certify I am changing or have changed wireless or traditional phone providers or phone number and in the event this application is granted, it will not result in more than one NTAP supported phone account in my household.

I understand completion of this application does not constitute immediate acceptance into this program. I agree to notify the Nebraska Public Service Commission or my phone company when I no longer participate in at least one of the following programs: Medicaid, Food Stamps, Low-Income Energy Assistance, Supplemental Security Income (SSI), Federal Public Housing Assistance or Children's Medicaid programs. I agree to fill out a new application requesting assistance prior to moving. I certify, under penalty of perjury, the above information is true. I have read the information on this application and understand I must meet the above qualifications to receive assistance from this program.

APPLICANT'S DATE OF BIRTH _____

APPLICANT OR AUTHORIZED REPRESENTATIVE SIGNATURE** _____

*If an authorized representative is signing the application, a copy of the Durable Power Of Attorney or Guardianship document must be included **

Questions? Call 1-800-526-0017 or
In Lincoln, 471-3101

Mailing Address:
NTAP P.O. Box 94927 Lincoln, NE 68509-4927

Vea el revers para la traduccion en Espanol

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EXECUTIVE DIRECTOR:
MICHAEL G. HYBL

«FIRSTNAME» «LASTNAME»
«ADDRESS»
«ADDRESS_2»
«CITY» «STATE» «ZIP»

August 5, 2011

Dear «FIRSTNAME» «LASTNAME»:

The Nebraska Telephone Assistance Program (NTAP), formerly the Lifeline-Linkup program, has been providing a discount toward the basic cost of your monthly telephone service. In accordance with Federal guidelines, NTAP customers must re-certify with the program every two years in order to continue receiving the monthly discount.

Enclosed you will find an application for NTAP. The application must be completed and returned to the Nebraska Public Service Commission within **60 days** from the date of this letter. Failure to return the completed application will result in the termination of your monthly NTAP discount.

If you have any questions or concerns, please contact our office by phone, 402-471-3101 or 1-800-526-0017, or by email at andrea.grell@nebraska.gov

Sincerely,
NTAP DEPARTMENT
Nebraska Public Service Commission